

Protective Measures

- * **Ensure personnel encrypt email designated as Controlled Unclassified Information (CUI)/For Official Use Only (FOUO)/PII.**
- * Minimize the collection, use, and retention of PII to what is required in order to accomplish the organization's mission and function.
- * Identify all PII in your organization and determine whether it is being properly protected.
- * Prohibit removal of information technology (IT) equipment and/or records containing PII from the workplace without supervisor approval.
- * Ensure personnel are aware of the protection requirements in TRADOC Supplement 1 to AR 25-2, requiring IT equipment removed from the workplace to have approved data-at-rest encryption.
- * Train personnel not to click on links or attachments in emails that are not digitally signed (phishing continues to be the top attack vector).
- * Do not post PII to a public website or to a government site not authorized for PII.
- * Never store or process PII on a personal device or transmit PII from .mil to .com.
- * Ensure that PII is not discarded in trash or recycle bins. Require destruction by cross-cut shredder, burning, or other approved method. Have someone check for compliance regularly.
- * Restrict access to PII to only those who have an official need-to-know. In particular, verify access/permission settings on network drives and portals.
- * Ensure that information systems processing or storing PII are accredited to do so.
- * Ensure that employees are trained on proper safeguarding/handling of PII.
- * Use a DD Form 2923, Privacy Act Data Cover Sheet when handling Privacy Act records/PII.
- * Use a DA Label 87, FOUO Cover Sheet when handling FOUO records.

Protecting PII is everyone's responsibility...

Additional Requirements

- * Owners of systems/applications/electronic data collections will complete the DD Form 2930, Privacy Act Impact Assessment, and may be required to reference or publish a Privacy Act System of Records Notice (SORN) (when information is retrieved using PII), and/or complete an Office of Management and Budget (OMB) control number approval documents (when information is collected from 10 or more members of the public annually).
- * Ensure records containing PII are managed and disposed of IAW AR 25-400-2, AR 380-5, and DA Pamphlet 25-403.
- * Provide individuals a Privacy Act Statement when asking them to provide personal information. Indicate (a) authority for collection, (b) purpose for collection, (c) routine uses and disclosure; and (d) whether providing information is voluntary or mandatory and consequences of not providing all of the requested information.
- * Use DoD ID numbers or other unique identifier in place of social security numbers (SSNs) whenever possible. The use of SSN in any form (truncated, masked, partially masked, etc.) must comply with DoD acceptable use policy or be eliminated.
- * PII must only be accessible to those with an official need-to-know. Just because a person routinely uses PII to perform their duties does not imply that they have a blanket need-to-know all the personal information of all the individuals contained in a system where they have access.
- * All new employees are required to take Information Assurance (IA), PII training before being allowed access to networks.
- * Army personnel who mishandle PII are subject to civil and/or criminal penalties.

and is essential for protecting the safety of our personnel.



Leader's Guide to Protecting Personally Identifiable Information (PII)

Protecting the Force by Protecting PII



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What is PII?

* Information which can be used to distinguish or trace an individual's identity, such as name, Social Security Number, DOD ID, and biometric records, alone, or when combined with other personal or identifying information which is linked or linkable to a specific individual, such as date and place of birth, and mother's maiden name.

* PII does not have its own retention period. PII is part of a record or system of records and IAW AR 25-400-2, records have assigned disposition schedules that prescribe how long the record is to be maintained, and when to destroy or transfer/archive them.

Internal vs External Use?

* Records containing PII are made available to Department of Defense(DOD) personnel who have a need-to-know in the performance of their duties.

* The need-to-know principle dictates that an authorized holder of record/PII, only share when two conditions are met: **1) the requester has the appropriate position and access, and 2) the requester has a need-to-know the information in order to perform his or her job functions.** When both conditions are met, provide the record/PII.

* Verifying that the requestor has the appropriate position is usually straightforward. You see their badge, or know that the communication is coming through channels at the appropriate level.

* Verifying their need-to-know, on the other hand, may require some judgment. If it's not clear that the requestor needs the information, then ask the chain of command to verify.

* Before PII is made available to the public (external third parties), a balancing of the public's right to know compared to an individual's right to privacy is analyzed to determine if the record/PII is released or withheld under the Freedom of Information Act, or other laws, and regulations.

* Business card/email signature information is PII used to conduct Government business.

* Designated personnel hold positions appointed as "public" positions and their names, and organization information may be public facing.

What is a PII Breach?

* A PII breach is a suspected or confirmed loss of control, unauthorized disclosure, or unauthorized access to PII, where persons without a need-to-know gain access or potential access for other than authorized purposes. The terms 'breach'/ 'incident' and 'violation' are inter-changeable, there is no reporting difference.

Examples of PII Breaches

* An e-mail containing CUI/FOUO/PII information is inadvertently sent to the wrong person or not encrypted IAW AR 25-1, email services.

* PII intended for internal CUI/FOUO use is published on a public facing website.

* A laptop or mobile device is lost or is stolen.

* An unauthorized third party overhears agency employees discussing PII about an individual seeking employment or discussing Federal benefits (leave or awards).

* Records containing PII thrown in the trash or recycling.

* Government computer compromised because a user clicked on an attachment or a web-link in an unsigned "phishing" message or browsed a malicious website.

* Alert roster, family member information, or other PII posted on a publicly-accessible web site.

* Use of home computer to process government data.

References

- * **OMB-17-12**, Safeguarding Against and Responding to the Breach of Personally Identifiable Information
- * **DoD 5400.11**, DoD Privacy Program
- * **DoD 5400-11-R**, DoD Privacy Program
- * **AR 25-1**, Army Information Technology
- * **AR 25-22**, The Army Privacy Program
- * **AR 25-55**, The Department of Army (DA) Freedom of Information Act Program
- * **AR 25-400-2**, The Army Records Information Management System (ARIMS)
- * **AR 360-1**, The Army Public Affairs Program
- * **AR 380-5**, Army Information Security Program
- * **AR 530-1**, Operations Security
- * **DA Pamphlet 25-1-1**, Army Information Technology Implementing Instructions
- * **DA Pamphlet 25-403**, Guide to Record Keeping in the Army
- * **DA Pamphlet 25-2-17**, Incident Reporting
- * **TRADOC Regulation 1-8**, Operations Reporting
- * **TRADOC Supplement 1 to AR 25-2**, Information Assurance

In Case of PII Breach

It is critical to report any suspected or confirmed PII breach **immediately** to the chain of command in accordance with (IAW) TRADOC Regulation 1-8.

<https://adminpubs.tradoc.army.mil/>

1. IMMEDIATELY: Notify your Chain of Command.

2. WITHIN (1 HOUR):

a. Fill out an incident report with USCERT at <https://us-cert.cisa.gov/forms/report> or the 24/7 hotline number (888) 282-0870.

b. IAW TRADOC Regulation 1-8 encrypt email to the TRADOC Operations Center at usarmy.jble.tradoc.mbx.tradoc-eoc-watch@mail.mil with the completed Serious Incident Report.

3. IAW LOCAL STANDING OPERATING PROCEDURE AND DA Pam 25-2-17: Notify your security manager and submit an Army Enterprise Service Desk (AESD) help desk ticket to report the PII breach at <https://snpro.aesd-w.army.mil/sp> or worldwide at 866-335-2769.

4. WITHIN (24 HOURS): TRADOC Office of the G-6 or the organization will report to HQDA Privacy Office and G-6 via PATS at: <https://www.privacy.army.mil/PATS/>

5. WITHIN (10 DAYS): When required, the organization that had responsibility to control access to the compromised PII will notify affected individuals.

This document is available for download at the TRADOC Privacy Act/PII web site

<http://www.tradoc.army.mil/PrivacyAct/>

Users are invited to send suggested improvements to the Office of the TRADOC Deputy Chief of Staff, G-6, usarmy.jble.tradoc.mbx.g-6-tradoc-atim1@mail.mil

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